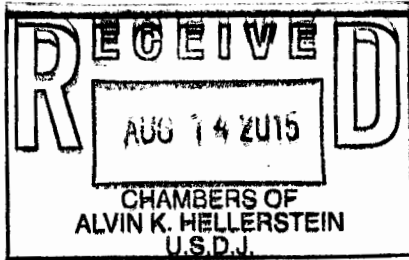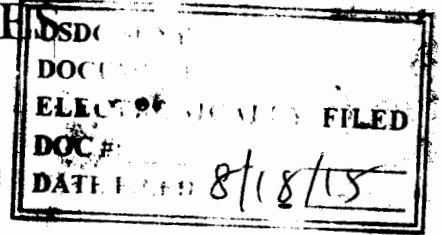# BORRELLI & ASSOCIATES

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So ordered.

August 12, 2015

8/18/2015

Via ECF

The Honorable Alvin K. Hellerstein
United States District Judge for the
Southern District of New York
500 Pearl Street, Courtroom 14D
New York, New York 10007-1312

Re: *Castillo et. al. v. El Tequilazo, et. al., Civil Action No.: 12-cv-3180*
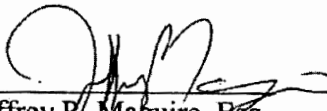
Dear Judge Hellerstein:

This office represents Plaintiffs, Carlos Castillo, Daniel Rodriguez, Carlos Palma, Cirilo Jimenez, Daniel Rodriguez, Diego Rodriguez, Jose P. Tlaxco, Natividad Gavilan, Pedro Toxqui Morales, and Adrian Gutierrez. Plaintiffs allege that they are former employees of Defendants who violated the Fair Labor Standards Act ("FLSA") and the New York Labor Law ("NYLL"). Plaintiffs respectfully submit this letter as a joint request for a brief extension to file Plaintiffs' motion to approve the settlement with Lazaro Navarro, Juan Navarro and Fernando Navarro (collectively, as the "Navarro Defendants").

On July 31, 2015, a status conference was held and the parties represented to the Court that a settlement had been reached between the Plaintiffs and the Navarro Defendants. The Court directed the Plaintiffs to file their motion for approval of the settlement by August 14, 2015. Furthermore, the Court directed the Navarro Defendants to provide assurance that the Navarro Defendants are capable of settling for the amount agreed upon. Plaintiffs and the Navarro Defendants are currently working to finalize a Settlement Agreement to provide to the Court as an exhibit to the Plaintiffs' motion.

Accordingly, the parties jointly request a brief extension of one week for the Plaintiffs to file the above-referenced motion.

We thank the Court for its time and attention to this matter.

Respectfully,

Jeffrey R. Maguire, Esq.

C: Edward V. Sapone, LLC (via ECF)
       Benjamin Sharav, Esq. (via ECF)